

William and Jacqueline Mellyn

June 12, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam:

I am writing in response to the proposed Business Opportunity Rule R511993. I understand that it is your responsibility to protect citizens from fraud and unfair practices, as you should. I believe that this rule change would do great harm to a business that we have been successfully operating for 20 years.

I am particularly distressed by the proposed 7 day waiting period. It would be obvious to anyone that is hearing about Sunrider Products for the first time that the rule is in place to protect them against something that is wrong. It would give a very negative impression and essentially eliminate a large percentage of clients and distributors that would be "scared away" from excellent products and a great business. I have spent many times more than the \$140 that a Starter Pack costs buying a vacuum cleaner. We are already protected by a 60-day return policy for existing distributors, which includes the Starter Pack. The added burden of keeping records and sending them to the company would be one more task that would not serve the intended purpose of the rule. Consumers are extremely well protected by Sunrider and time would be better spent asking other companies to follow the model that the Company has been successfully using for years.

I find the concept of laying out all of the information on Lawsuits, to again be a burdensome and unfair practice. In this litigious society, everyone gets sued. If we had to lay out the Lawsuits that Sunrider successfully defended then again we would be giving the impression that something is wrong when there is not. Anyone can research a company if they have a concern, which includes all companies not just Direct Marketing Sales.

The rule that would require us to divulge information about others that we have set up in business would again have detrimental effects on our business. I do not allow information about myself or my family to be used by any business or person without my expressed consent, which I never give. I do not imagine anyone I sign up in the business allowing me to give out their information to people that they do not know either, and they certainly cannot be compelled to do so. The proposed line "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers", would raise the hackles of any prospective business person.

My wife and I have been buying products and running a business for 20 years. My wife is a Pharmacist and has recently quit working in that field to operate our business full time.

We both love the products and the business and are planning to continue running this business when I retire in six years. It will be a major part of our retirement income and I could see the proposed rule changes jeopardizing our current income and our retirement.

I know that the FTC is attempting to produce something positive to protect consumers from fraudulent and unscrupulous companies. I would think that there would be other less obtrusive or burdensome rule changes that would accomplish this purpose. Please give serious consideration to the consequences of this rule. It could be very damaging to the majority of business owners who are honest and abide by the law both in spirit and in fact.

Thank you for taking the time to consider our opinion,

Sincerely,

William and Jackie Mellyn